

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of  
Telecommunications and Energy on its own Motion  
into the Appropriate Pricing, based upon Total  
Element Long-Run Incremental Costs, for  
Unbundled Network Elements and Combinations of  
Unbundled Network Elements, and the Appropriate  
Avoided Cost Discount for Verizon New England,  
Inc. d/b/a Verizon Massachusetts' Resale Services  
in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T's SIXTEENTH SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits the following information  
requests to Verizon. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name  
of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon  
subsequently receives or becomes aware of additional information responsive to these  
requests.

If an answer refers to Verizon's response to another information request in this proceeding,  
please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon  
cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege  
claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

## INFORMATION REQUESTS

- ATT-VZ 16-1. State whether it is technically feasible for two CLECs to establish a cross connection between their respective collocation arrangements without having to make such cross connection via Verizon's network.
- ATT-VZ 16-2. Provide (in both hard copy and electronic format) all Operational Documentation of the Loop Cost Analysis Model (LCAM) v1.5.4, identifying the data sources and flow-through, including explanations for the Oracle SQL aggregation formulas.
- ATT-VZ 16-3. Provide (in both hard copy and electronic format) all workpapers, support and underlying documentation for the inputs to LCAM as documented in "Section 5 – Study Inputs" of "Part B-1 Unbundled Loops." Specifically, provide the basis and support for:
- (a) the constant factor values shown in Section 5.2 Study Factors;
  - (b) the cable lengths shown in Section 5.3 Thresholds;
  - (c) the cable investment (material and EF&I) and the "Pct each size" for each type of cable shown in Section 5.5 Cable Investments;
  - (d) the COT Investment and the COT Plug-in Investment per circuit shown in Section 5.6 DLC Electronics – Central Office End;
  - (e) the Enclosure and Hardware Investments (Material and Install) shown in Section 5.7 DLC Electronics – Remote Terminal End;
  - (f) the investments per pole (35, 40 and 45 foot), the adjustment for multiple sheaths, the average span length between poles and the working ratio shown in Section 5.8 Pole Investment;
  - (g) the drop and distribution terminal investments (aerial, buried, and building) and the average working lines shown in Section 5.9 Other Distribution Investments; and
  - (h) all of the wire center-related values in Sections 5.10, 5.11 and 5.12.
- ATT-VZ 16-4. Provide descriptions and definitions for the headings of the factors in all of the Wire Center-related Values (Sections 5.10-5.12). For example, in Section 5.12 Wire Center-related Values – Part 3, define and describe the heading "ADROP."

- ATT-VZ 16-5. In the file MA 01-20 Loop Sum.xls (the monthly cost summary provided by Verizon in Part B-1 Unbundled loops), Verizon has weighted each of the loop services by specific percentages of Integrated GR303 and Universal TR008. Explain the weighting of each of these services and provide all workpapers and support for this weighting.
- ATT-VZ 16-6. Provide (in both hard copy and electronic format) all workpapers, support and underlying documentation for the drop lengths shown in 5.12 Wire Center-related Values – Part 3.
- ATT-VZ 16-7. State whether Verizon has any plans through the end of 2002 to provision any DSL service in Massachusetts via NGDLC. If the answer is yes, provide details of those plans.

Respectfully submitted,  
AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.  
By its attorneys,

---

Jeffrey F. Jones  
Kenneth W. Salinger  
Jay E. Gruber  
Emily R. Donovan  
Kevin R. Prendergast  
Palmer & Dodge LLP  
One Beacon Street  
Boston, MA 02118  
(617) 573-0100

June 7, 2001